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VIA ECF

Hon. Judge Analisa Torres
United States District Court Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Delancey v. FOX Corporation et al*, Case No. 1:23-cv-10357 (AT)

Dear Judge Torres:

We represent Plaintiff in the above-captioned matter. Pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure and Your Honor's Individual Practices, we write to kindly request leave to amend Plaintiff's Complaint, filed on December 4, 2023 (Dkt. No. 1). Counsel for all Defendants have provided written consent for Plaintiff to file his Amended Complaint.

On December 13, 2023, in accordance with Section III(B)(ii) of Your Honor's Individual Practices, counsel for the Fox Corporation and Fox Network, LLC (collectively, the "Fox Defendants") notified Plaintiff that the Fox Defendants intended on moving to dismiss Plaintiff's claims against them. On December 20, 2023, Plaintiff responded to Fox Defendants and notified them of his intention to amend his complaint to include additional factual allegations that relate to the issues raised by the Fox Defendants in their letter. On January 17, 2024, counsel for Defendant Wells, through counsel for the Fox Defendants, confirmed that Defendant Wells did not intend on moving to dismiss Plaintiff's Complaint. Subsequently, counsel for all parties conferred and agreed to a timetable by which Plaintiff would seek leave to file his Amended Complaint.

As such, in accordance with Section III(H) of Your Honor's Individual Practices, please find a copy of Plaintiff's Proposed Amended Complaint attached as Exhibit A, as well as a redline showing all differences between the operative pleading and the proposed amended pleading, attached as Exhibit B.


We thank Your Honor for your time and consideration.

Respectfully submitted,

GRANTED. By **February 9, 2024**, Plaintiff shall file his amended complaint.

SO ORDERED.

Dated: February 5, 2024
New York, New York



ANALISA TORRES
United States District Judge